

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

IN RE:

Case No. 10-15047-RGM

JOSEPH A. ROBERTS AKA JOSEPH ALAN
ROBERTS AKA JOE ROBERTS
Debtor

Chapter 13

JPMORGAN CHASE BANK NATIONAL ASSOCIATION,
Movant

v.

JOSEPH A. ROBERTS AKA JOSEPH ALAN
ROBERTS AKA JOE ROBERTS
Debtor/Respondent

and

THOMAS P. GORMAN,
Trustee/Respondent

OBJECTION TO CONFIRMATION OF DEBTOR'S PROPOSED CHAPTER 13 PLAN

COMES NOW, JPMorgan Chase Bank, National Association (the "Movant"), by and through counsel Stephen B. Wood and Bierman, Geesing, Ward & Wood, LLC and files its Objection to the Debtors' Chapter 13 Plan, and respectfully represents as follows:

1. Movant is a mortgage lender/servicer.
2. On or about June 17, 2010, Joseph A. Roberts aka Joseph Alan Roberts aka Joe Roberts ("Debtor(s)") filed a Voluntary Petition in this Court under Chapter 13 of the United States Bankruptcy Code.
3. Thomas P. Gorman is the Trustee of the Debtor's estate.
4. Movant holds a deed of trust solely secured by the Debtor's property known as 1435 4th Street Southwest, Washington, DC 20024 (the "Property").

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(804) 282-0463
Attorney for the Movant

5. On or about July 1, 2010, Debtor(s) filed a Chapter 13 Plan that does not include the Movant.

6. On information and belief the property was sold from Mark Herlong, Trustee for Riverside Condominium Unit Owners Association to Dereje Seifu on February 4th, 2009. However, the lien was never satisfied and Movant believes they are secured.

7. The debtor(s) is not current, and the correct pre-petition arrears are \$58,511.22 as indicated in the Proof of Claim filed by Movant.

8. Confirmation hearing is scheduled September 8, 2010 at 09:30 AM at Judge Mayer's Courtroom, 200 South Washington Street, 3rd Floor, Courtroom III, Alexandria, VA.

WHEREFORE, the Movant prays that this Court:

1. Enter an order DENYING confirmation of the Debtor's Chapter 13 Plan; and
2. Require Debtor to amend the Chapter 13 Plan within an imposed deadline to properly reflect the Movant's lien and the correct arrearage amount; and
3. Grant such other and further relief as necessary.

Dated: September 1, 2010

Respectfully Submitted,
Bierman, Geesing, Ward & Wood, LLC

/s/ Stephen B. Wood
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CERTIFICATION

I HEREBY CERTIFY that on this 1st day of September, 2010, the following person(s) were served with copy of the foregoing Objection to Chapter 13 Plan electronically via the CM/ECF system or by first class mail postage prepaid to:

John L. Lilly, Jr., Esq.
10195 Main Street, Suite I
Fairfax, VA 22031

Thomas P. Gorman
300 N. Washington St. Ste 400
Alexandria, VA 22314

Joseph A. Roberts aka Joseph Alan Roberts aka Joe Roberts
1435 4th Street Southwest
Washington, DC 20024

/s/ Stephen B. Wood
Stephen B. Wood

PLANOBJECTION